IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC., d/b/a WRS MOTION PICTURE LABORATORIES, a corporation,

Plaintiff,

vs.

PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual,

Defendants.

CIVIL ACTION

No. 00-2041

JOINT MOTION TO AMEND ORDER OF COURT

AND NOW comes, WRS, Inc. d/b/a WRS Motion Picture Laboratories, a corporation, by and through its counsel, Thomas E. Reilly, P.C., with the following Motion:

1. Plaintiff and Defendant, John Herklotz, filed an Amended Stipulation, the purpose of which was to stay the proceedings in the District Court pending the conclusion of Defendant Herklotz' appeal to the Third Circuit. The correct Stipulation was filed on April 22, 2008 at Docket No. 201 in the within proceedings.

2. The Stipulation contemplated the filing of three Orders of Court. The first, staying the proceedings; the second, providing for an injunction against transfer of stock currently pledged by Herklotz to Wells Fargo Bank; and, the third, appointing First National Bank and Trust Company as escrow agent.

3. The Order staying the proceedings was recorded at Docket No. 202 in the within proceedings and provides for the staying of these proceedings. The last paragraph of that Order provided that "the entry of this Order staying proceedings to enforce the judgment pending the Herklotz appeal shall not in any way restrict the ability of Plaintiff to enforce the judgments entered in this matter against the other Defendants for which, as

of the date of this Order, no supersedes bond has been posted nor other order entered staying enforcement proceedings."

4. The Order entered at Docket No. 202 does not accurately state the final version of the Order of Court contemplated by the Stipulation in that Thomas E. Reilly and John P. Sieminski amended the final paragraph, to delete the reference to judgments entered against other Defendants as this Court has opened those judgments. The correct version of the Order contemplated is attached to this Motion. Accordingly, the Order of Court entered April 22, 2008 at Docket No. 202 should be vacated and the appropriate order entered as attached to this Motion.

WHEREFORE, WRS, Inc. d/b/a WRS Motion Picture Laboratories by and through its counsel, Thomas E. Reilly, and John C. Herklotz through his counsel, Amanda Rubio of Burns, White and Hickton, have consented to the correction.

Respectfully Submitted,
Thomas E. Reilly, P.C.

/s/ Thomas E. Reilly, Esq.

Thomas E. Reilly, Esq.
Pa. I.D. #25832
Attorney for WRS, Inc.

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/s/ Amanda Rubio

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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT
OF PENNSYLVANIA

WRS, INC., d/b/a WRS MOTION PICTURE LABORATORIES, a corporation, Plaintiff, vs. PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual, Defendants.	CIVIL ACTION No. 00-2041

ORDER OF COURT

AND NOW to wit, this ___________ day of __________________, 2008, upon the Joint Motion of Plaintiff and Defendant, John C. Herklotz, by and through their respective counsel, it appearing to the Court that the Order entered on April 22, 2004, at Docket No. 202 in the within proceedings does not accurately set forth the version of the Order of Court contemplated by the Stipulation, it is hereby Ordered, Adjudged and Decreed that that Order shall be vacated and further that the Order attached to the this Motion shall be entered in accordance with the Stipulation.

By the Court

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC. d/b/a WRS MOTION PICTURE LABORATORIES, a corporation,	)	
Plaintiff,	)	
vs.	)	C.A. No. 00-2041
PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual,	)	
Defendants	)	

ORDER OF COURT

AND NOW, to-wit, this ___________ day of ____________________, 2008, upon consideration of the foregoing Stipulation, it is hereby ORDERED, ADJUDGED and DECREED that the proceedings to enforce the Judgment entered on February 20, 2007 in favor of WRS, Inc. and against the Defendant, John Herklotz, shall be, and are hereby, stayed pending the completion of the appeal before the United States Court of Appeals for the Third Circuit at Docket No. 07-1712 (or any related docket number) during the pendency of the appeal. Either party may move to modify the terms of the stay of proceedings.

The entry of this shall not impact or otherwise restrict the rights of WRS, Inc., and Herklotz with respect to other Defendants in the within matter notwithstanding the pendency of the appeal.

BY THE COURT:

______________________________J.